

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

SOLSTICE WIRELESS LLC,

Plaintiff,

v.

T-MOBILE USA, INC. and T-MOBILE US,  
INC.,

Defendants.

Case No.: 4:22-CV-723-SDJ

Jury Trial Demanded

**JOINT STATUS REPORT CONCERNING  
STAY AND SETTLEMENT NEGOTIATIONS**

COME NOW Plaintiff SOLSTICE WIRELESS LLC (“Plaintiff” or “Solstice”), and Defendants T-MOBILE USA, INC. and T-MOBILE US, INC. (“Defendants” or “T-Mobile”) and pursuant to the Court’s March 3, 2023, Order (D.I. 23) granting the parties Joint Motion to Stay All Deadlines (D.I. 22), respectfully submit this Joint Status Report Concerning the Stay and Settlement Negotiations as follows:

The parties have engaged in numerous and substantive settlement discussions in good faith throughout the stay period, and believe that the additionally requested time to continue those discussions will allow them to reach a resolution of this matter. The parties jointly request that the Court extend the stay of all unreach deadlines in the case for an additional sixty (60) days.

Dated: May 1, 2023

Respectfully submitted,

/s/ Raymond W. Mort, III

Raymond W. Mort, III  
Texas State Bar No. 00791308  
[raymort@austinlaw.com](mailto:raymort@austinlaw.com)

THE MORT LAW FIRM, PLLC  
501 Congress Avenue, Suite 150  
Austin, Texas 78701  
Tel/Fax: 512-865-7950

*Of Counsel:*

Ronald M. Daignault (*pro hac vice* to be filed)\*

Chandran B. Iyer (*pro hac vice* to be filed)

Oded Burger \*

[rdaignault@daignaultiyer.com](mailto:rdaignault@daignaultiyer.com)

[cbiyer@daignaultiyer.com](mailto:cbiyer@daignaultiyer.com)

[oburger@daignaultiyer.com](mailto:oburger@daignaultiyer.com)

Daignault Iyer LLP

8618 Westwood Center Drive

Suite 150

Vienna, VA 22182

Attorneys for Solstice Wireless LLC

\* - Not admitted to practice in Virginia

/s/ Darlene Ghavimi

Darlene F. Ghavimi

TX Bar No. 24072114

Matthew Blair

TX Bar No. 24109648

K&L GATES LLP

2801 Via Fortuna, Suite 650

Austin, Texas 78746

512.482.6800

[Darlene.ghavimi@klgates.com](mailto:Darlene.ghavimi@klgates.com)

[Matthew.blair@klgates.com](mailto:Matthew.blair@klgates.com)

Theodore J. Angelis  
K&L GATES LLP  
925 4th Avenue, Suite 2900  
Seattle, WA 98104  
206.623.7580  
Theo.angelis@klgates.com

Melissa R. Smith  
TX Bar No. 24001351  
GILLAM & SMITH LLP  
303 South Washington Avenue  
Marshall, Texas 75670  
903.934.8450  
melissa@gillamsmith.com

*Attorneys for T-Mobile USA, Inc. and T-Mobile  
US, Inc.*